Applicant: Anita B. Marsh et al. Attorney's Docket No.: 06269-030001 / PB 00 0032

Serial No.: 09/843,429 Filed: April 25, 2001

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REMARKS

Claims 1-34 are pending.

Claims 1-14 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,584,186 (Aravamudan et al.) in view of U.S. Patent No. 6,421,727 (Reifer et al.). Applicants respectfully disagree.

Claim 1 recites downloading a call service component in response to a network carrier turning on a service "for a particular user area," rather than on a per-call basis. Downloading a call service component in that manner can improve the speed and efficiency of a system implementing that technique by reducing the amount of communication that otherwise would be required if components were downloaded on a per-call basis. Neither the Aravamudan et al. patent nor the Reifer et al. patent discloses or suggests that feature.

The Aravamudan et al. patent merely discloses a call coordinator that loads and executes feature applets to process calls. (See column 7, lines 5-23) Those feature applets can be loaded from anywhere in the network and may be utilized to deliver certain call processing features as required by particular call sessions. (See column 15, lines 7-19) No mention is made, however, of downloading a call service component in response to a network carrier turning on a service for a particular service area, as is recited in claim 1.

The Office Action identifies two specific passages in the Aravamudan et al. patent that supposedly disclose downloading a call service component in response to a network carrier turning on a service "for a particular user area." (See Office Action, ¶ 3) Applicants respectfully submit that none of those passages disclose or suggest the claimed subject matter.

The first cited passage (i.e. column 7, lines 32-44 of the Aravamudan et al. patent) merely discloses an exemplary architecture for PSTN/IP communications network 100 that implements certain network safety principles. (See also FIG. 1) The architecture includes a call processing complex 155 with a softswitch. The first cited passage mentions nothing about downloading a call service component in response to a network carrier turning on a service for a particular service area, as is recited in claim 1.

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The second cited passage (*i.e.* column 11, line 18 – column 12, line 8) also does not disclose the subject matter that is recited in claim 1. The second cited passage merely discloses a method that includes requesting a connection from a single call coordinator 160, establishing the connection, monitoring the connection and terminating the connection. (*See also* FIG. 1) The second cited passage indicates that if certain feature processing is desired for a particular call, the need to provide such service is indicated by a request, which is read by the call coordinator 160. The call coordinator 160 then runs the appropriate applets. The cited passage neither discloses nor suggests downloading a call service component in response to a network carrier turning on a service for a particular service area, as is recited in claim 1.

The Reifer et al. patent also fails to disclose or suggest downloading a call service component in response to a network carrier turning on a service for a particular service area, as is recited in claim 1. Instead, the Reifer et al. patent merely discloses a browser at a service provider's location that downloads a JAVA application which, when executed, provides for service provisioning from a gateway business system (GBS) database. (See column 9, lines 7-14 and FIG. 9)

Claim 1 should be allowable for at least the foregoing reasons.

Claims 2-14 depend from claim 1 and, therefore, should be allowable for at least the same reasons as claim 1.

Claims 15-34 also were rejected under 35 U.S.C. §103(a) as being unpatentable over the Aravamudan et al. patent in view of the Reifer et al. patent.

Independent claims 15, 23 and 34 recite language similar to the language discussed above with respect to claim 1. Those claims, therefore, should be allowable for at least the same reasons as claim 1.

Claims 16-22 and 24-33 depend from allowable claims and should, therefore, also be allowable for at least the same reasons as the claims from which they respectfully depend.

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Applicants have amended the paragraph beginning at page 6, line 11 to correct minor typographical errors. No new matter has been added.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

No fee is believed to be due. However, please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

- W Donday

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